



CALIFORNIA FARM BUREAU FEDERATION

NATURAL RESOURCES AND ENVIRONMENTAL DIVISION

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September 29, 2010

Chairman Phil Isenberg and Members of the Council
Delta Stewardship Council
650 Capitol Mall
Sacramento, CA 95814

Re: Comments on the September 24, 2010 Presentation by the Environmental Water Caucus

Mr. Chairman and Members of Council:

The California Farm Bureau Federation ("Farm Bureau") has reviewed the September 24, 2010 presentation of the Environmental Water Caucus ("EWC") to the Delta Stewardship Council, and urges you to reject the EWC recommendation that the Council set up a work group to pursue the EWC policy prescriptions. Farm Bureau also wishes to comment more generally on policy and informational points raised in the EWC presentation.

Farm Bureau is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 81,000 members. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and farm products through responsible stewardship of California's resources. As such, Farm Bureau has long been involved in policy processes related to its aim of securing and protecting an affordable and reliable supply of water for farmers and ranchers, and has most recently committed substantial resources to processes such as Delta Vision and the Bay-Delta Conservation Plan ("BDCP").

The EWC presentation to the Council was styled as an "alternative" for the Council to consider, consisting of "a bold new direction" and "change of focus" from the ongoing BDCP process. While certainly bold, it is not at all new in proposing a rabbit-in-a-hat solution to California's water crisis by focusing single-mindedly on Delta water exports and the retirement of vast acreages of farmland. These policy prescriptions are familiar, and received due consideration as recently as the Delta Vision process. The chief problem with a return to this interest-group approach to California's water crisis is that it asks the Council to divert from a path of forward-

looking and responsible – as well as politically tenable – planning to prepare for a California that will soon reach a population of 50 million people.

The EWC “alternative” asks the Council to, in essence, depart from the co-equal goals defined in Water Code section 85054 by ignoring water supply reliability for a large portion of California’s economy and population. It does this by disclaiming any need for new infrastructure, by calling for the apparent retirement of more than a million acres of productive farmland, by throttling the operations of the Central Valley Project and the State Water Project south of the Delta, and by relying upon sweeping and dubious application of legal doctrine to “reform” the system of California water rights. Perhaps most staggering, it offers a vision of 8 million acre-feet of agricultural water use savings through simple efficiency measures. In reality, this approach would really require the Council to meet the co-equal goal of water supply reliability by finding that California farms and ranches just do not need much water – and that the conveyance solution in the Delta is, essentially, no conveyance.

In point of fact, California farms and ranches depend upon reliable water supplies, and California’s farmers and ranchers have nearly doubled their production of food and other farm products in the last 40 years while using a largely constant amount of water. More and more crops are on drip irrigation, micro-sprinkler, and other efficient water systems, and yet California remains the nation’s top agricultural producer with a farm economy estimated at an annual \$34.8 billion. Farm Bureau expects California to retain its pre-eminent position in agriculture in coming years, always if incrementally on a more water-efficient basis, but sudden “water shock” such as proposed by EWC would cause major disruption to the agricultural economy and California’s political fabric.

This is not to say that EWC has not highlighted a number of problems that are not to be ignored, and solutions that are not to be discarded. Salts and toxics are management problems in any system of irrigated agriculture, and pricing is a valid policy question. By the same token, water recycling, desalination, groundwater and surface storage, and constant efforts at urban and agricultural efficiency are all potential parts of the water solution spectrum for California. What is most problematic with EWC’s vision is that it is unbalanced, it remains export- and agriculture-centric, and it may obscure obvious policy necessities by placing a large and politically untenable burden on California farms and ranches in an old, familiar way.

Finally, strictly in environmental terms, it should be noted that the inevitable outcome of the EWC “alternative” is the off-shoring of much agricultural production to other countries, which is an environmentally myopic approach. Few countries have the regulatory framework that California farmers operate within, and whether measured in food-miles or measured in terms of comparative local environmental impact, the general global result is the California agriculture is the preferred environmental alternative.

Farm Bureau looks forward to continued engagement in pragmatic processes that are calculated to bring durable solutions to California's water crisis, rather than returning to old interest-group politics that have dominated the water wars of the past. As such, Farm Bureau hopes that the Council will take EWC's latest presentation and recommendation under advisement, but not for action.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christian C. Scheuring', written over the printed name.

Christian C. Scheuring
Managing Counsel

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